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Attorney for: Santander Consumer USA Inc.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	)	
	)	Case No. 19-20626(VFP)
Kevin Van Putten	)	
	)	Chapter 13
	)	
	)	Hearing date: 8-1-19
	)	
	)	<u>OBJECTION TO CONFIRMATION</u>
	)	

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Santander Consumer USA Inc. ("Santander") a secured creditor of the debtor, objects to the debtor's plan for the following reasons:

- a. **PLAN SILENT:** Santander holds a first purchase money security interest encumbering a 2008 Chevrolet Tahoe owned by the debtor. The plan is silent as to Santander. The plan should be amended to state that Santander is unaffected by the plan and is being paid outside the plan directly by the debtor.
- b. **Lien retention:** Santander must retain its lien on the vehicle after confirmation and until the loan is paid in full by the debtor according to its terms. This should be the case even if the case completes before the loan is

paid. All provision in the plan concerning lien release should be stricken as to Santander.

- c. **Proof of insurance:** Santander requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).

/s/ John R. Morton, Jr.  
John R. Morton, Jr., attorney for  
Santander Consumer USA Inc.

Dated: 7-3-19